

DIEMER & WEI, LLP

Kathryn S. Diemer (#133977)
100 West San Fernando Street, Suite 555
San Jose, CA 95113
Telephone: (408) 971-6270
Facsimile: (408) 971-6271
Email: kdiemer@diemerwei.com

WILLKIE FARR & GALLAGHER LLP

Matthew A. Feldman (*pro hac vice*)
Joseph G. Minias (*pro hac vice*)
Benjamin P. McCallen (*pro hac vice*)
787 Seventh Avenue
New York, NY 10019-6099
Telephone: (212) 728-8000
Facsimile: (212) 728-8111
Email: mfeldman@willkie.com
jminias@willkie.com
bmccallen@willkie.com

Counsel for Ad Hoc Group of Subrogation Claim Holders

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

Case No. 19-30088

Chapter 11

(Lead Case)

(Jointly Administered)

**NOTICE OF HEARING ON THE MOTION OF
THE AD HOC GROUP OF SUBROGATION
CLAIM HOLDERS FOR RELIEF FROM THE
AUTOMATIC STAY**

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

**All papers shall be filed in the lead
case, No. 19-30088 (DM)*

Date: July 24, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Objection Deadline: July 19, 2019 at 4:00 p.m.

1 **PLEASE TAKE NOTICE** that on July 24, 2019, at 9:30 a.m. (Pacific Time) at the United
2 States Bankruptcy Court for the Northern District of California, located at 450 Golden Gate Avenue,
3 16th Floor, San Francisco, California in Courtroom 17 before the Honorable Dennis Montali, the Ad
4 Hoc Group of Subrogation Claim Holders (“**Ad Hoc Subrogation Group**”) will bring on for a
5 hearing its Motion for Relief from the Automatic Stay under Bankruptcy Code section 362(d) in
6 order to pursue claims of the Ad Hoc Subrogation Group’s members against PG&E Corporation and
7 Pacific Gas and Electric Company (hereinafter “**PG&E**” or the “**Debtors**”) regarding the issue of the
8 Debtors’ liability for the Tubbs Fire in the California Superior Court, where the claims are currently
9 pending in a Coordination Proceeding, Case No. 4955 (the “**Motion**”).
10

11 The Motion is based on this Notice of Hearing, the Motion, the Memorandum of Points and
12 Authorities in Support of the Ad Hoc Group of Subrogation Claim Holders’ Motion for Relief from
13 the Automatic Stay and points and authorities therein, the Declaration of Benjamin P. McCallen and
14 supporting exhibits, and such other and further evidence and matters that this Court may consider at
15 the hearing of the Motion.
16

17 **PLEASE TAKE FURTHER NOTICE** that any oppositions or responses to the Motion must
18 be in writing, filed with the Bankruptcy Court, and served on the counsel for the Ad Hoc Subrogation
19 Group at the above-referenced addresses so as to be received by no later than **4:00 p.m. (Pacific**
20 **Time) on July 19, 2019.** Any oppositions or responses must be filed and served on all “Standard
21 Parties” as defined in, and in accordance with, the *Second Amended Order Implementing Certain*
22 *Notice and Case Management Procedures* entered on May 14, 2019 (ECF No. 1996) (“**Case**
23 **Management Order**”).
24

25 **PLEASE TAKE FURTHER NOTICE** that as provided in Local Rule 4001-1(a), the Debtors
26 are advised to appear personally or by counsel at the hearing, and that failure to do so may result in
27
28

1 this Court granting the relief requested without further hearing, including granting relief from the
2 automatic stay to allow the Ad Hoc Subrogation Group to pursue claims of the Ad Hoc Subrogation
3 Group's members against the Debtors regarding the issue of the Debtors' liability for the Tubbs Fire
4 in the California Superior Court, where the claims are currently pending in a Coordination
5 Proceeding, Case No. 4955.
6

7
8 Dated: July 3, 2019
9

10 **WILLKIE FARR & GALLAGHER LLP**

11 /s/ Benjamin P. McCallen

12 Matthew A. Feldman (*pro hac vice*)

13 Joseph G. Minias (*pro hac vice*)

14 Benjamin P. McCallen (*pro hac vice*)

15 787 Seventh Avenue

16 New York, NY 10019-6099

17 Telephone: (212) 728-8000

18 Facsimile: (212) 728-8111

19 Email: mfeldman@willkie.com

20 jminias@willkie.com

21 bmccallen@willkie.com

22 *Counsel to the Ad Hoc Group of Subrogation Claim Holders*
23
24
25
26
27
28